

Karma M. Giulianelli (SBN 184175)
karma.giulianelli@bartlitbeck.com

BARTLIT BECK LLP
1801 Wewetta St., Suite 1200
Denver, Colorado 80202
Telephone: (303) 592-3100

Hae Sung Nam (*pro hac vice*)
hnam@kaplanfox.com

KAPLAN FOX & KILSHEIMER LLP
850 Third Avenue
New York, NY 10022
Telephone.: (212) 687-1980

*Co-Lead Counsel for the Proposed Class in In re
Google Play Consumer Antitrust Litigation*

Paul J. Riehle (SBN 115199)
paul.riehle@faegredrinker.com
**FAEGRE DRINKER BIDDLE & REATH
LLP**
Four Embarcadero Center, 27th Floor
San Francisco, CA 94111
Telephone: (415) 591-7500

Christine A. Varney (*pro hac vice*)
cvarney@cravath.com
CRAVATH, SWAINE & MOORE LLP
825 Eighth Avenue
New York, New York 10019
Telephone: (212) 474-1000

*Counsel for Plaintiff Epic Games, Inc. in Epic
Games, Inc. v. Google LLC et al.*

Steve W. Berman (*pro hac vice*)
steve@hbsslaw.com
HAGENS BERMAN SOBOL SHAPIRO LLP
1301 Second Ave., Suite 2000
Seattle, WA 98101
Telephone: (206) 623-7292

Brendan P. Glackin (SBN 199643)
bglackin@agutah.gov
**OFFICE OF THE UTAH ATTORNEY
GENERAL**
160 E 300 S, 5th Floor
PO Box 140872
Salt Lake City, UT 84114-0872
Telephone: (801) 366-0260

Counsel for Utah and the States

John C. Hueston (SBN 164921)
jhueston@hueston.com **HUESTON
HENNIGAN LLP**
620 Newport Center Drive, Suite 1300
Newport Beach, CA 92660
Telephone: (949) 229-8640

*Counsel for Plaintiffs Match Group, LLC, et
al.*

Glenn D. Pomerantz (SBN 112503)
glenn.pomerantz@mto.com
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, Fiftieth Floor
Los Angeles, California 90071
Telephone: (213) 683-9100

Brian C. Rocca (SBN 221576)
brian.rocca@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco, CA 94105-1596
Telephone: (415) 442-1000

Daniel M. Petrocelli, Bar No. 97802
dpetrocelli@omm.com
O'MELVENY & MYERS LLP
1999 Avenue of the Stars, 7th Fl.
Los Angeles, CA 90067-6035
Telephone: (310) 553-6700

Counsel for Defendants Google LLC et al.

1 Eamon P. Kelly (pro hac vice)
ekelly@sperling-law.com

2 **SPERLING & SLATER P.C.**

55 W. Monroe, Suite 3200

3 Chicago, IL 60603

4 Telephone: 312-641-3200

5 *Co-Lead Counsel for the Proposed Class in In re*
Google Play Developer Antitrust Litigation and
6 *Attorneys for Pure Sweat Basketball, Inc.*

7 Bonny E. Sweeney (SBN 176174)

bsweeney@hausfeld.com

8 **HAUSFELD LLP**

600 Montgomery Street, Suite 3200

9 San Francisco, CA 94104

10 Telephone: (415) 633-1908

11 *Co-Lead Counsel for the Proposed Class in In re*
Google Play Developer Antitrust Litigation and
12 *Attorneys for Peekya App Services, Inc.*

13 [Additional counsel appear on signature page]

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

Epic Games Inc. v. Google LLC et al.,
Case No. 3:20-cv-05671-JD

*In re Google Play Consumer Antitrust
Litigation*, Case No. 3:20-cv-05761-JD

*In re Google Play Developer Antitrust
Litigation*, Case No. 3:20-cv-05792-JD

State of Utah et al. v. Google LLC et al.,
Case No. 3:21-cv-05227-JD

*Match Group, LLC et al. v. Google LLC et
al.*, Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**STIPULATED [PROPOSED] ORDER
MODIFYING SEALING PROCEDURES
RELATING TO PLAINTIFFS' MOTION
FOR SANCTIONS**

Courtroom: 11, 19th Floor (via Zoom)
Judge: Hon. James Donato

STIPULATED [PROPOSED] ORDER MODIFYING SEALING PROCEDURES RELATING TO PLAINTIFFS'
MOTION FOR SANCTIONS

Case No. 3:21-md-02981-JD; 3:20-cv-05761-JD; 3:20-cv-05792-JD; 3:22-cv-02746-JD

1 WHEREAS, Epic Games, Inc., the Consumer Plaintiffs, the Developer Plaintiffs, the State
2 Plaintiffs, the Match Group Plaintiffs and the Google Defendants (collectively the “Parties”)
3 respectfully move this Court for a modification to the sealing procedures applicable to the joint
4 statement to be filed on May 27, 2022 in accordance with the Court’s May 12, 2022 Notes and
5 Order (Dkt. # 230) on the grounds set forth herein.

6 WHEREAS, in accordance with the Notes and Order, the Parties will file a joint statement
7 setting forth the Parties’ proposal for a “method of resolution” of their dispute concerning
8 document preservation by the Google Defendants, which will include “a proffer from Plaintiffs”
9 and supporting exhibits; and

10 WHEREAS, the Google Defendants may take the position that the joint statement and
11 supporting exhibits may contain material that should be filed under seal consistent with the
12 operative Protective Order and Local Rule 79-5;

13 WHEREAS, Plaintiffs disagree that any of the material cited in the joint statement or the
14 supporting exhibits meets the standard for filing under seal but agree to permit the Google
15 Defendants additional time to review whether a sealing motion is necessary; and

16 WHEREAS, the Parties wish to conserve the resources of the Court and the Parties and to
17 avoid the need to brief multiple sealing motions with respect to the joint statement and Plaintiffs’
18 forthcoming motion for sanctions, and further believe it will be most efficient to handle all sealing
19 issues, if any, in omnibus sealing motions to be filed shortly following the briefing on Plaintiffs’
20 motion for sanctions.

21 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED SUBJECT TO
22 THE COURT’S APPROVAL:

- 23
- The Parties may file redacted versions of the Parties’ May 27, 2022 joint statement,
- 24 Plaintiffs’ motion for sanctions, the Google Defendants’ opposition to the motion,
- 25

Plaintiffs' reply brief, and any associated supporting documents, as separate entries on the ECF docket;

- If any material is filed in redacted form, the Parties shall also contemporaneously file unredacted copies of all documents on the ECF docket provisionally under seal, along with a 1-page interim sealing motion which may indicate that the reasons for sealing will be discussed in a forthcoming omnibus sealing motion; and
- The Parties and any affected third parties shall jointly file omnibus sealing motions within 14 days after the filing of the Plaintiffs' reply brief in support of the motion for sanctions.

Dated: May 26, 2022

BARTLIT BECK LLP
Karma M. Giulianelli

KAPLAN FOX & KILSHEIMER LLP
Hae Sung Nam

Respectfully submitted,

By: /s/ Karma M. Giulianelli
Karma M. Giulianelli

*Co-Lead Counsel for the Proposed Class in
In re Google Play Consumer Antitrust
Litigation*

Dated: May 26, 2022

PRITZKER LEVINE LLP
Elizabeth C. Pritzker

Respectfully submitted,

By: /s/ Elizabeth C. Pritzker
Elizabeth C. Pritzker

*Liaison Counsel for the Proposed Class in
In re Google Play Consumer Antitrust
Litigation*

1 Dated: May 26, 2022

FAEGRE DRINKER BIDDLE & REATH LLP
Paul J. Riehle

2 CRAVATH, SWAIN & MOORE LLP
3 Christine A. Varney

4 Respectfully submitted,

5 By: /s/ Paul J. Riehle
6 Paul J. Riehle

7 *Counsel for Plaintiff Epic Games, Inc. in*
8 *Epic Games, Inc. v. Google LLC et al.*

9 Dated: May 26, 2022

OFFICE OF THE UTAH ATTORNEY
GENERAL
Brendan P. Glackin

10 Respectfully submitted,

11 By: /s/ Brendan P. Glackin
12 Brendan P. Glackin

13 *Counsel for Utah and the States*

14 Dated: May 26, 2022

HAGENS BERMAN SOBOL SHAPIRO LLP
Steve W. Berman
Robert F. Lopez
Benjamin J. Siegel

17 SPERLING & SLATER PC
18 Joseph M. Vanek
19 Eamon P. Kelly
Alberto Rodriguez

20 Respectfully submitted,

21 By: /s/ Steve W. Berman
Steve W. Berman

22 *Co-Lead Interim Class Counsel for the*
23 *Developer Class and Attorneys for*
24 *Plaintiff Pure Sweat Basketball*

1 Dated: May 26, 2022

HAUSFELD LLP
Bonny E. Sweeney
Melinda R. Coolidge
Katie R. Beran
Scott A. Martin
Irving Scher

Respectfully submitted,

By: /s/ Bonny E. Sweeney
Bonny E. Sweeney

*Co-Lead Interim Class Counsel for the
Developer Class and Attorneys for
Plaintiff Peekya App Services, Inc.*

9 Dated: May 26, 2022

HUESTON HENNIGAN LLP
John C. Hueston
Douglas J. Dixon
Joseph A. Reiter
Michael K. Acquah
William M. Larsen
Julia L. Haines

Respectfully submitted,

By: /s/ Douglas J. Dixon
Douglas J. Dixon

*Counsel for Match Group, LLC, Humor
Rainbow, Inc., PlentyofFish Media ULC,
People Media, Inc. ("Match Group
Plaintiffs")*

18 Dated: May 26, 2022

MORGAN, LEWIS & BOCKIUS LLP
Brian C. Rocca
Sujal J. Shah
Minna L. Naranjo
Rishi P. Satia
Michelle Park Chiu

Respectfully submitted,

By: /s/ Brian C. Rocca
Brian C. Rocca

Counsel for Defendants Google LLC et al.

1 Dated: May 26, 2022

O'MELVENY & MYERS LLP

Daniel M. Petrocelli

Ian Simmons

Benjamin G. Bradshaw

Stephen J. McIntyre

2 Respectfully submitted,

3 By: /s/ Stephen J. McIntyre

4 Stephen J. McIntyre

5 *Counsel for Defendants Google LLC et al.*

6 Dated: May 26, 2022

MUNGER, TOLLES & OLSON LLP

Glenn D. Pomerantz

Kyle W. Mach

Kuruvilla Olasa

Justin P. Raphael

Emily C. Curran-Huberty

Jonathan I. Kravis

7 Respectfully submitted,

8 By: /s/ Glenn D. Pomerantz

9 Glenn D. Pomerantz

10 *Counsel for Defendants Google LLC et al.*
11 *in In re Google Play Consumer Antitrust*
12 *Litigation; In re Google Play Developer*
13 *Antitrust Litigation; Epic Games, Inc. in*
14 *Epic Games, Inc. v. Google LLC; State of*
15 *Utah et al. v. Google LLC et al.*

16 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

17 Dated: _____

18 HON. JAMES DONATO

19 United States District Judge

E-FILING ATTESTATION

I, Stephen J. McIntyre, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Stephen J. McIntyre